

EXHIBIT I

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Notice of Attorney Withdrawal
Mr. Parnell Colvin



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Sent Via Email

February 8, 2023

TO: Mr. Parnell Colvin
pc681@yahoo.com

NOTICE OF ATTORNEY WITHDRAWAL DUE TO MATERIAL MISREPRESENTATIONS

Mr. Colvin:

When I was retained as your attorney for Colvin v. Tako, LLC (A-20-820973-C), we had multiple intake conversations before and after my retention, where you falsely represented to me that you were unable to obtain employment (as a laborer) due to injuries you suffered from a slip-and-fall incident on February 19, 2019. These slip-and-fall injuries serve as the basis for Colvin v. Tako, LLC. Moreover, these slip-and-fall injuries—and your alleged consequent inability to obtain employment as a laborer—serve as a basis for the economic damages you are seeking.

Today, I have been made aware of a federal court case titled Colvin v. M.J. Dean Constr. (D. NV 2:20-cv-01765-APG-EJY). In his opinion dated 6-10-22, Judge Andrew Gordon stated that “In July 2019, Dean hired Colvin to work as a laborer on the Madison Square Garden Sphere project”—employment that you obtained after your slip-and-fall injuries. This lawsuit is related to “alleged retaliation, discrimination, and harassment in violation of Title VII and state law, as well as negligent training and supervision” regarding your employment at M.J. Dean.

Based on Judge Gordon’s opinion, you worked as a laborer after your slip-and-fall incident. This is absolutely contrary to the multiple false representations you made to me, where you stated that you were unable to obtain work as a laborer after the slip-and-fall incident, due to the injuries you sustained.

This is a material misrepresentation. Moreover, you have made other material misrepresentations to me, including your failure to tell me that you stayed at the subject property in Colvin v. Tako LLC past the lease period by two years.

1-2

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These material misrepresentations, and your lack of candor, have made it impossible for me to represent you. Consequently, you have given me no choice but to withdraw as your attorney in Colvin v. Tako, LLC.

Please find this letter to be my Notice of Attorney Withdrawal. I intend to file my Notice of Attorney Withdrawal with the Clark County District Court.

I do not have your most current address since your recent move. Please send it to me via email, and I will mail any case documents I have to this address, along with this notice. I do not want you to come to my office to pick it up.

I wish you the very best in your future endeavors.

Thank you very much.

Very Truly Yours,

/s/ Milan Chatterjee, Esq.

Milan Chatterjee, Esq.
Founder & Managing Member
Milan's Legal

2-2